

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:
GEORGIA ELLIS

Debtor) CASE NO: 19-45495-659
) Chapter 13
)
) Trustee's Objection to Confirmation
) Original Confirmation Hearing set for:
) October 24, 2019 11:00 am

TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The plan fails to pay the full attorney fee owed per the 2016(b) form.
2. The plan does not contain enough funds to pay secured and priority creditors in full and pay the amount guaranteed to general unsecured creditors (if any). 11 U.S.C. §§ 1322(a)(2) and 1325(a)(5)(B)(ii). The approximate amount of the shortfall is \$1250.

WHEREFORE the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: October 14, 2019

OBJCONFAF--KLW

/s/ Kathy Wright
Kathy Wright MO31047
Attorney for Trustee
P.O. Box 430908
St. Louis, MO 63143
(314) 781-8100 Fax: (314) 781-8881
trust33@ch13stl.com

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on October 14, 2019, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on October 14, 2019.

GEORGIA ELLIS
3804 COUNCIL GROVE
SAINT LOUIS, MO 63110

/s/ Kathy Wright
Kathy Wright MO31047